

STEPHANIE M. HINDS (CABN 154284)
Acting United States Attorney

HALLIE HOFFMAN (CABN 210020)
Criminal, Division Chief

ANDREW M. SCOBLE (CABN 124940)
RICHARD EWENSTEIN (CABN 294649)
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-6842
Fax: (415) 436-7234
Email: andrew.scoble@usdoj.gov
Email: richard.ewenstein@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN AGUILAR, et al.,

Defendant.

No.: CR 18-0119-RS

STIPULATION AND
PROTECTIVE ORDER

STIPULATION

It is hereby STIPULATED by the parties, through undersigned counsel, that:

- Any medical records, including but not limited to hospital records and medical examiner reports, related to any victim, whether alive or deceased, produced by the government to defense counsel in this case shall be used solely for the preparation of defendants' defenses. Such records shall not be further disseminated or copied absent further order of the Court, except that defense counsel may provide copies to their paralegals, retained experts, and investigators. No person other than defense counsel of record and their

paralegals, retained experts, and investigators shall view such records absent further order of the Court. The parties agree that all records produced within the Bates range “MEDICAL” shall be governed by this paragraph.

2. The 2013 San Francisco Police Department Informant Management Manual, produced by the government at Bates range SFPD-00000029 – 58, shall be used solely for the preparation of defendants’ defenses and shall not be further disseminated or copied absent further order of the Court. No person other than defense counsel of record shall view this manual absent further order of the Court.

3. Should defense counsel wish to submit to the Court in unredacted format copies of any materials governed by Paragraphs 1 or 2, above, defense counsel shall do so only in an “under seal” filing.

IT IS SO STIPULATED.

Dated: May 20, 2021

STEPHANIE M. HINDS
Acting United States Attorney

By: /s/
ANDREW M. SCOBLE
RICHARD EWENSTEIN
Assistant United States Attorneys

Dated: May 20, 2021

/s/
MARTHA BOERSCH
Counsel for Jonathan Aguilar

Dated: May 20, 2021

/s/
JULIA MEZHINSKY JAYNE
Counsel for Juan Carlos Gallardo

Dated: May 20, 2021

/s/
HARRIS BRUCE TABACK
Counsel for Orlando Carlos Hernandez

Dated: May 20, 2021

/s/
MARK GOLDROSEN
PAM HERZIG
DONALD KNIGHT
AMY P. KNIGHT

Counsel for Michael Rebolledo

Dated: May 20, 2021

/s/

GEORGE C. BOISSEAU
Counsel for Mario Reyes

Dated: May 20, 2021

/s/

SHAFFY MOEEL
JAMES S. THOMSON
Counsel for Eddy Urbina

Dated: May 20, 2021

/s/

ETHAN A. BALOGH
Counsel for Weston Venegas


PROTECTIVE ORDER

Based upon the above Stipulation, THE COURT ORDERS THAT:

1. Any medical records, including but not limited to hospital records and medical examiner reports, related to any victim, whether alive or deceased, produced by the government to defense counsel in unredacted format in this case, including but not limited to all records produced within the Bates range "MEDICAL" shall be used solely for the preparation of defendants' defenses. Such records shall not be further disseminated or copied absent further Order of the Court, except that defense counsel may provide copies to their paralegals, retained experts, and investigators. No person other than attorneys of record and their paralegals, retained experts, and investigators shall view such records absent further order of the Court.
2. The 2013 San Francisco Police Department Informant Management Manual, produced by the government at Bates range SFPD-00000029 – 58, shall be used solely for the preparation of defendants' defenses and shall not be further disseminated or copied absent further order of the Court. No person other than defense counsel of record shall view this manual absent further order of the Court.
3. Should defense counsel wish to submit to the Court in unredacted format copies of any materials governed by Paragraphs 1 or 2, above, defense counsel shall do so only in an "under seal" filing.

IT IS SO ORDERED.

DATED: 5/24/2021


HON. RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE